## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

In re TERRORIST ATTACKS ON SEPTEMBER 11, 2001

Case No. 1:03-md-01570 (GBD)(SN)

This document relates to:

Knight, et al. v. The Islamic Republic of Iran, Case No. 18-cv-12398 (GBD)(SN)

## PLAINTIFFS' NOTICE OF MOTION TO AMEND PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 15

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and Exhibit A attached hereto, the Plaintiff identified in Exhibit A respectfully moves the Court pursuant to Fed. R. Civ. P. 15(a)(2) for leave to amend Plaintiffs' Complaint to restate the claim of the Plaintiff in Appendix 1 attached thereto amending the "General Nature of the Claim Asserted" to reflect a personal injury claim against the Defendant, The Islamic Republic of Iran. Plaintiff is named in Appendix 1 to the original Iran Short Form Complaint and this motion does not add any additional parties, but seeks only to amend the general claim asserted on behalf of the Plaintiff to reflect a personal injury claim rather than a solatium claim as originally stated in the pleadings.

Respectfully submitted,

\_/s/ Robert Keith Morgan \_

Robert Keith Morgan The Miller Firm, LLC 108 Railroad Avenue Orange, VA 22960

Tel: 540-672-4224 Fax: 540-672-3055

kmorgan@millerfirmllc.com